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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 CYNTHIA GOODWYN,

10 Plaintiff,

11 vs.

12 ALBERTSON'S LLC,

13 Defendant.
14

Case No. 2:18-cv-01754-JAD-EJY

STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(SEVENTH REQUEST)

15 In accordance with Local Rules of Practice for the United States District Court for the
16 District of Nevada ("LR") 26-4, Defendant Albertson's LLC ("Defendant"), by and through its
17 counsel of record, the law firm of BACKUS, CARRANZA & BURDEN, and Plaintiff Cynthia
18 Goodwyn ("Plaintiff"), by and through her counsel of record, the law firm of SGRO & ROGER,
19 hereby stipulate and agree to an extension of all remaining discovery deadlines by sixty (60)
20 days. The parties propose the following revised discovery plan:

21 **DISCOVERY COMPLETED TO DATE**

22 The parties have exchanged initial and supplemental disclosures of documents and the
23 names of individuals with knowledge of the facts pertaining to the claims set forth in this matter.
24 The parties have propounded and responded to written discovery requests including
25 interrogatories and requests for production. Defendant has subpoenaed Plaintiff's medical

records and taken Plaintiff's deposition. Plaintiff has taken the deposition of Defendant's FRCP 30(b)(6) witness. The parties have made initial and rebuttal expert disclosures.

DISCOVERY TO BE COMPLETED

The parties intend to take the deposition of experts, Plaintiff's treating physicians and other percipient witnesses.

REASONS FOR EXTENSION TO COMPLETE DISCOVERY

Given the current health emergency occasioned by the outbreak of the novel coronavirus (COVID-19) and the corresponding Stay-At-Home Order, the Parties have postponed depositions due to the difficulty in preparing and defending witnesses remotely. Further, following Governor Sisolak's directive to combat the spread of COVID-19, law firms for the Parties have been closed to the public and counsel have been working remotely with limited staff and resources which significantly impacted the Parties' ability to conduct discovery and meet the applicable deadlines. The parties therefore request for a 60-day extension of the remaining discovery deadlines in light of the COVID-19 pandemic. This request is made in good faith, not for the purpose of delay.

PROPOSED NEW DISCOVERY DEADLINES

Initial Expert Disclosure:

Currently: January 6, 2020

Proposed: N/A

Interim Status Report:

Currently: January 6, 2020

Proposed: N/A

Rebuttal Expert Disclosure:

Currently: February 5, 2020

Proposed: N/A

Discovery Cutoff:

Currently: June 4, 2020

Proposed: August 3, 2020

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Dispositive Motions:

Currently: July 7, 2020

Proposed: September 4, 2020

Pretrial Order:

Currently: August 6, 2020, or 30 days after resolution of dispositive motions per
Local Rule 26-1(b)(5)

**Proposed: October 5, 2020, or 30 days after resolution of dispositive motions
per Local Rule 26-1(b)(5)**

DATED: this 16th day of April, 2020.

DATED: this 16th day of April, 2020.

SGRO & ROGER

BACKUS, CARRANZA & BURDEN

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ORDER

IT IS SO ORDERED.

DATED: April 16, 2020


UNITED STATES MAGISTRATE JUDGE